



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 2 1998

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for the On-Unit Containment of Radiological Contaminants in Soil at the Savannah River Superfund Site

FROM: Bruce K. Means, Chair
National Remedy Review Board 

TO: Richard D. Green, Acting Director
Waste Management Division
EPA Region 4

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed remedial action for the On-Unit Containment of Radiological Contaminants in Soil at the Savannah River Superfund Site in South Carolina. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

As you recall, the Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds \$30 million, or (2) the preferred alternative costs more than \$10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative.

The NRRB review evaluates the proposed actions for consistency with the National Contingency Plan and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; Regional, State/tribal, and other stakeholder opinions on the proposed actions, and any other relevant factors.

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional

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decision maker before the Region issues the proposed plan. The Region will then include these recommendations in the Administrative Record for the site. While the Region is expected to give the Board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

NRRB Advisory Recommendations

The NRRB reviewed the informational package for the Savannah River Site (SRS) and discussed related issues with EPA project manager Jeff Crane and Keith Collinsworth of the South Carolina Department of Health and Environmental Control on February 3-4, 1998. Based on this review and discussion, the Board offers the following comments.

- o DOE relies on remedy selection analyses conducted for similar site conditions at the SRS as the basis for selecting the remedy for this cleanup decision. The Board supports this type of "plug-in" cleanup strategy in concept. However, the Board believes the plug-in record of decision (ROD) for this complex action must include criteria in sufficient detail to allow regulatory agencies and the public to determine objectively the response components that will trigger once the unit characterization data become available. Such detail was not presented in the reviewed materials nor was it clear from the review discussion. The Board recommends that DOE assess thoroughly and describe in its decision documents these criteria. For example, the documents should include a detailed discussion of the conditions that would warrant treatment, specific performance expectations of any treatment, conditions that would warrant a soil cover or cap, and the performance objectives for such caps and/or covers, etc.
- o The Board is concerned that the public participation process, as described by DOE, may not provide adequate opportunity for input into decision making, especially after the ROD has been signed and specific operable units (OUs) are being "plugged in" to the ROD. The Board recommends that DOE ensure that the public is aware of, and has the opportunity to comment on, (1) proposed decisions about whether specific OUs trigger the ROD criteria (and thus would be subject to the plug-in ROD approach), and (2) the selection of specific plug-in waste management approaches (e.g., soil cover vs. cap vs. treatment) for individual OUs addressed.
- o The Board understands DOE has found centralized on-site repositories to be cost effective waste management tools, especially where the anticipated number of actions at a facility involving waste containment is large. The decision documents did not provide the Board information sufficient to determine the cost effectiveness of DOE's proposed in-place waste management strategy vs. waste excavation and transport to such an on-site repository. The Board recommends that DOE include analysis of this alternative strategy in its decision documents. While the Region indicates that such an analysis has been done, the Board recommends that it be revised to include more accurate, realistic and comparable assumptions about soil volumes and excavation depths, the costs associated with long term monitoring of each proposed in-place waste management area, the size of the centralized waste repository considered, and whether other actions unrelated to the seepage basins to be addressed by this ROD may benefit from its availability .

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- o The Board is not certain whether DOE considered background risk in estimating the target risk levels for contaminants of concern at the site. The Board recommends that DOE tailor remedial action objectives to reflect relevant background contaminant risk levels and include this information in the decision documents for this site. DOE should consult EPA guidance titled "Establishment of Cleanup Levels For CERCLA Sites with Radioactive Contamination" (OSWER Directive 9200.4-18, August 22, 1997) for further guidance.
- o The materials presented indicated that there may be continued discussion among the federal agencies and the State concerning the selection of appropriate contaminant levels that would trigger action in an area, and the selection of final remediation goals once action has been triggered. The Board refers DOE, the Region, and the State to the guidance mentioned in the previous paragraph for further information on these issues.

The NRRB appreciates the Region's efforts to work closely with DOE, the State of South Carolina, and community to identify the current proposed remedy. The Board members also express their appreciation to the Region and State for their participation in the review process. We encourage Region 4 management and staff to work with their Regional NRRB representative and the Region 4/10 Accelerated Response Center at Headquarters to discuss any appropriate follow-up actions.

Please do not hesitate to give me a call if you have any questions at 703-603-8815.

cc: S. Luftig
T. Fields
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J. Woolford
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OERR Center Directors

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